

EXHIBIT 2

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PAULA F. SOTO,

Plaintiff,

Civil Action No. 1:13-cv-10822-JGD

v.

CITY OF CAMBRIDGE,

Defendant.

**PLAINTIFF PAULA F. SOTO'S SECOND SET OF REQUESTS FOR ADMISSION TO
DEFENDANT CITY OF CAMBRIDGE**

Pursuant to Federal Rules of Civil Procedure 26 and 36, and Local Rule 36.1, Plaintiff Paula F. Soto ("Soto") requests that Defendant City of Cambridge (the "City") respond to the following requests for admission in writing under oath within thirty (30) days of service of these requests.

INSTRUCTIONS

1. If you object to part of a Request and refuse to respond to that part, state your objection and respond to the remaining portion of the Request. If you object to the scope of a Request, state your objection and respond to the Request for the scope which you believe is appropriate.
2. If a Request cannot be responded to in full after the exercise of due diligence, so state and respond to the extent possible and provide whatever information you have concerning the Request. If your response is qualified in any manner, set forth the details of such qualification.
3. These Requests will be deemed admitted if you do not respond within thirty (30) days of service of the Requests.

DEFINITIONS

1. The Uniform Definitions in Discovery Requests set forth in Rule 34(a) of the Federal Rules of Civil Procedure, and the Uniform Definitions in Discovery Requests set forth in Local Rule 26.5 are incorporated by reference.
2. The Definitions and Instructions set forth in Plaintiff's First Set of Requests for Production for the Production of Documents and Tangible Things to Defendant City of Cambridge are incorporated herein by reference.
3. The terms "you" and "your" refer to the City, as well as its officers, directors, employees, partners, or affiliates.

4. The term “City Officials” refer to the City’s authorized decision makers and its agents, including, but not limited to, the City Manager, Deputy City Manager, Police Commissioner, and members of the City Council.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 24

Admit that from at least December 12, 2011, through the present, City Officials have interpreted M.G.L. ch. 266, §126 to prohibit placing leaflets on the windshields of cars parked on public streets.

REQUEST FOR ADMISSION NO. 25

Admit that on December 12, 2011, when a Cambridge Police Department officer instructed Ms. Soto that she could not place leaflets on publicly parked cars, that officer was acting consistent with and pursuant to City Officials' interpretation of M.G.L. ch. 266, §126.

REQUEST FOR ADMISSION NO. 26

Admit that no City Officials have taken action against the City police officer for his instructions to Ms. Soto on December 12, 2011.

REQUEST FOR ADMISSION NO. 27

Admit that sometime after December 12, 2011, the City police officer was told by City Officials or its agents that he acted appropriately when instructing Ms. Soto that she could not place leaflets on publicly parked cars.

REQUEST FOR ADMISSION NO. 28

Admit that, after consultation with City Officials, the police commissioner directly or through his agents instructed Cambridge police officers to enforce M.G.L. ch. 266, §126 against people they see putting flyers on publicly parked cars or if they receive complaints regarding such leafleting.

REQUEST FOR ADMISSION NO. 29

Admit that the City will enforce, or at least threaten to enforce, a prohibition against Ms. Soto from placing noncommercial leaflets on parked cars on public streets if the City receives a complaint from a resident regarding such leafleting.

REQUEST FOR ADMISSION NO. 30

Admit that the City will enforce, or at least threaten to enforce, fines against Ms. Soto for placing noncommercial leaflets on parked cars in the City of Cambridge if the City receives a complaint from a resident regarding such leafleting.

REQUEST FOR ADMISSION NO. 31

Admit that the City will not enforce, or threaten to enforce, a prohibition against Ms. Soto from placing noncommercial leaflets on parked cars on public streets.

REQUEST FOR ADMISSION NO. 32

Admit that the City will not enforce, or threaten to enforce, fines against Ms. Soto for placing noncommercial leaflets on parked cars in the City of Cambridge.

Dated: October 6, 2015

Respectfully submitted,

/s/ Julia M. Ong

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Attorneys for Plaintiff Paula F. Soto

CERTIFICATE OF SERVICE

I, Julia Ong, hereby certify that a true copy of the above document was served by electronic mail on the following person:

Samuel Aylesworth (saylesworth@cambridgema.gov)

Dated: October 6, 2015

/s/ Julia M. Ong
Julia M. Ong